

Exhibit B

Jake Bernstein

From: DePalma, Nicholas M. <NMDePalma@Venable.com>
Sent: Thursday, April 23, 2015 1:37 PM
To: Derek Linke
Subject: Verisign v. XYZ - status on protective order

Derek,

Here is what I see as the current state of play:

1. Verisign believes a single-tier protective order (providing for confidentiality) is appropriate.
2. XYZ believes that a two-tier protective order (confidential and "highly confidential") is appropriate.
3. We have been trying to reach a resolution on this that would provide all parties comfort. Toward that end:
 - a. We have discussed limiting the group on highly confidential designation to the law department, senior management (the "executive team" on the website), board of directors, and no more than 3 employees (not to be marketing employees).
 - b. You indicated that your client does not feel comfortable with that, but that you would:
 - i. Try to tighten the language of the second tier; and
 - ii. Counter-propose a smaller group of the parties' respective employees who could review highly confidential material (i.e., some smaller universe of the law department, like 3 lawyers and a paralegal, plus 3 employees (not to be marketing employees)).
4. My hope is that we can receive your counter-proposal in concept today or tomorrow.

If we cannot reach agreement, we discussed the best way to get this before the Court (whether by motion or joint motion), which we would set for May 8, 2015 (the same date as the 12(c) motion).

But in the interim, we both agreed that we could agree to produce the documents over which there is no dispute—i.e., documents that would be marked "CONFIDENTIAL" only, or not marked at all.

Please let me know if I'm missing anything—and I look forward to receiving your counter-proposal.

Many thanks,

-Nick

Nicholas M. DePalma, Esq. | Venable LLP
t 703.905.1455 | f 703.821.8949
8010 Towers Crescent Drive, Suite 300, Tysons Corner, VA 22182

NMDePalma@Venable.com | www.Venable.com

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